



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

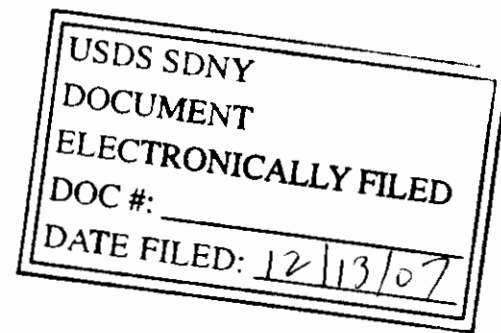
86 Chambers Street – 3rd Floor  
New York, New York 10007

December 12, 2007

**By Hand**

Hon. Richard J. Sullivan  
United States District Judge  
United States District Courthouse  
500 Pearl Street, Room 615  
New York, New York 10007

Re: New York Times v. Dep't of Defense,  
07 Civ. 7481 (RJS)



Dear Judge Sullivan:

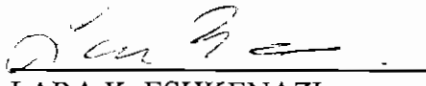
I write respectfully on behalf of both parties in the above-referenced case to request a one-week extension of time from December 12, 2007 to December 19, 2007, for the parties to submit summary judgment motions with respect to Count II of the complaint. The reason for this request is that the parties are in the final stages of negotiating the terms of a proposed Stipulation and Order that would resolve the issues raised in Count II of the complaint. The parties expect to submit the proposed Stipulation and Order to the Court by December 17, 2007.

I thank the Court for its consideration of this matter.

Respectfully,

MICHAEL J. GARCIA  
United States Attorney

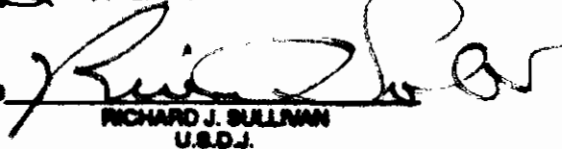
By:

  
LARA K. ESHKENAZI  
Assistant United States Attorney  
Tel. No.: (212) 637-2758

cc: David E. McCraw (by facsimile 212-556-1009)

*As requested, summary judgment motions are to be filed by Dec. 19, 2007.*

SO ORDERED  
Date:

  
RICHARD J. SULLIVAN  
U.S.D.J.

*12/13/07*